



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

KAVIN THADANI
Senior Counsel
Phone: (212) 356-2351
Fax: (212) 356-3509
kthadani@law.nyc.gov

January 31, 2018

VIA ECF

Honorable Ann Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Martinez v. City of New York, et al., No. 1:16-cv-00079-AMD-CLP

Your Honor:

I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney representing defendants in the above-referenced matter. Pursuant to Your Honor's Individual Practices and Rules, defendants write to respectfully request leave to file an additional five (5) pages for their Memorandum of Law in Support of Defendants' Objections to Magistrate Judge Pollak's Report and Recommendation, which is due to be filed by February 7, 2018. Plaintiff takes no position with respect to this request.

The reason for this request is that defendants require the additional requested pages in order to adequately address the issues raised by Magistrate Judge's Report and Recommendation, which is 79 pages in length.

Accordingly, defendants respectfully request leave to file an additional five (5) pages for their Memorandum of Law in Support of Defendants' Objections to Magistrate Judge Pollak's Report and Recommendation.

Thank you for your consideration of this application.

Respectfully,

/s/ Kevin Thadani

Kavin Thadani
Senior Counsel
Special Federal Litigation

cc: **VIA ECF**
Baree Fett, Esq.
Gabriel Harvis, Esq.
Attorneys for Plaintiff